BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011   Docket No. N2011-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO PUBLIC REPRESENTATIVE INTERROGATORIES PR/USPS-T1-6 THROUGH 9
REDIRECTED FROM WITNESS BOLDT

The United States Postal Service hereby provides institutional responses to the

above-listed interrogatories of the Public Representative dated August 4, 2011. Each

interrogatory is stated verbatim and followed by the response. The interrogatories have

been redirected to the Postal Service from witness Boldt.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno, Jr.
Chief Counsel, Global Business

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
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RESPONSE OF THE UNITED STATES POSTAL SERVICE

TO INTERROGATRY OF THE PUBLIC REPRESENTATIVE

REDIRECTED FROM WITNESS BOLDT

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PR/USPS-T1- 6

The postal retail facility "Red Devil AK" is under consideration for closure according to cell A6 in tab "new_2hrs" in USPS-LR-2, as is "Crooked Creek AK" (cell A5), and "Sleetmute AK" (cell A14). According to the Post Office locator at http://usps.whitepages.com/post_office/AK/99656?d=40", the closest postal retail facilities to the Red Devil AK location are as follows:

City	State	ZIP	Distance
Red Devil	AK	99656	0.0 mi
Sleetmute	AK	99668	12.7 mi
Crooked Creek	AK	99575	31.6 mi
Chuathbaluk	AK	99557	37.8 mi

(a) Please confirm that in cell I13442 of tab "data" in file "Nearest Neighbor graph data.xls," the nearest neighbor to the Red Devil AK postal retail location is neither recorded as 12.7 miles, nor 31.6 miles, nor 37.8 miles.

(b) Please explain why the data for this location in USPS-LR-NP1 does not match the information available on the USPS Post Office locator.

(c) In general, does the "Nearest Neighbor" pool include postal retail facilities that, in addition to the target facility, may be closed as a result of the RAO initiative within 365 days of the determination to close the target facility?

(d) How are "Nearest Neighbors" identified and their distance from each other calculated when there are multiple (i.e., more than two) concurrent postal retail facility closures within a particular geographic area?

(e) Please explain the steps the Postal Service will pursue to ensure that accurate information is available regarding the distance to alternative access points in event of closure.

RESPONSE

(a) Confirmed.

(b) As explained in response to PR/USPS-T1-X, Table 5 is based strictly on data reflecting latitude/longitude "as the crow flies" distances.

Postal Locator distances are driving distances between locations.

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RESPONSE to PR/USPS-T1-6 (continued)

(c)   The question is not clear. Nearest Neighbor facilities are ones for which latitude/longitude data were available in a particular data base that does not reflect the entire postal retail network or the subset of the retail network within the scope of the RAO Initiative. No analysis of the Table 5 facilities has been performed to determine any degree of correlation they may have to RAO candidate facilities, or to facilities that may be closed 365 days (or any other time period) after a facility is closed as a result of RAO.

(d)   Bear in mind that the Nearest Neighbor Table 5 plays no role in the execution of the RAO Initiative. Surface driving distances will be used in the RAO Initiative to determine the distance between a candidate for discontinuance and the closest nearby retail location. If RAO candidate facilities are in sufficiently close proximity that each is the "nearest neighbor" to the other, this fact will be taken into account in the review process in determining the fate of the two facilities.

(e)   Electronic Facilities Management System driving distance measurements will be checked against local management knowledge, other driving distance mapping software such as Bing, or odometer tests, if necessary.

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PR/USPS-T1- 7

The postal retail facility "Goodsprings AL" is under consideration for closure according to cell A26 in tab "new_2hrs" in USPS-LR-2. According to the Post Office locator at http://usps.whitepages.com/post_office/35560, the closest postal retail facility is the Parrish AL location, which is 5.5 miles away.

a. Please confirm that in cell I1636 of tab "data" in file "Nearest Neigbor graph data.xls," the nearest neighbor to the "Goodsprings AL" postal retail locations is not recorded as 5.5 miles away.

b. Please explain why the data for this location in USPS-LR-NP1 does not match the information available on the USPS Post Office locator.

c. According to Google Maps, the driving distance from the Goodsprings AL location to the Parrish AL location is 7.6 miles, (http://maps.google.com/maps?saddr=824+Goodsprings+Road,+Parrish,+AL&daddr=5911+Highway+269,+Parrish,+AL+35580&hl=en&ll=33.694352,-87.261658&spn=0.212236,0.140762&sll=37.0625,-95.677068&sspn=51.222969,31.289063&geocode=FbuUAQId9B3N-imNkHZqS_OIiDGuiiDCy8Ixhg%3BFXzwAgIdz1nM-inlfxUlZoqIiDHSSKzOd99jwA&mra=ls&t=h&z=12) please discuss the steps the Postal Service will pursue to ensure that accurate information is available regarding the actual travel distance to alternative access points in event of closures.

RESPONSE

(a)   Confirmed.

(b)   Please see the response to PR/USPS-T1-6(b).

(c)   Please see the response to PR/USPS-T1-6(e).

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PR/USPS-T1- 8
Please discuss how the database used to calculate USPS-LR-NP2 and table 5
on page 12 your testimony differs from the database used to calculate the
distance between postal facilities at http://usps.whitepages.com.

RESPONSE

Table 5 is based strictly on data reflecting latitude/longitude "as the crow flies"

distances.

White Pages is an outside vendor that currently hosts the Post Office Locator on

usps.com. It uses the Bing mapping system to create maps and driving

directions. As customers use the Post Office Locator on usps.com, White Pages

geo codes a customer's input address information, then utilizes geo code data for

the facilities in the USPS Facilities Data Base to create the map/driving directions

to each postal location.

RESPONSE OF THE UNITED STATES POSTAL SERVICE

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PR/USPS-T1- 9
Please provide the database used to calculate the distance between postal facilities at http://usps.whitepages.com.

RESPONSE

The Bing mapping system database used to calculate driving distances for White

Pages is proprietary to Microsoft. The database is the intellectual property of

Microsoft and is not within the custody or control of the Postal Service.